

BOOK 33 - 630

IRENE HALEY, et al * NO. 24,201 EQUITY
Complainants * IN THE CIRCUIT COURT FOR
vs. * FREDERICK COUNTY, MARYLAND
BERNARD H. STOUTER, et al *
RESPONDENTS *

* * * * *

ANSWER TO BILL OF COMPLAINT
FOR
PETITION SALE OF REAL PROPERTY

Bernard H. Stouter and Charles J. Stouter, Respondents, by Frederick J. Bower, their Solicitor for Answer to Bill of Complaint say:

1. Charles J. Stouter says that he is also a son of Joseph Stouter who died December 22, 1946.

2. Charles J. Stouter and Bernard H. Stouter say that from April 18, 1909 their father, Joseph Henry Stouter occupied said parcel of real estate, claiming ownership thereto, paying taxes assessed thereon until the time of his death on December 22, 1946, after December 22, 1946, Mrs. Martha A. Stouter, mother of Bernard H. Stouter and Charles J. Stouter continued to occupy, possess and pay taxes assessed concerning said real estate until the time of her death on November 16, 1966. That since the death of Martha A. Stouter, Charles J. Stouter and Bernard H. Stouter have paid the taxes on said real estate and possessed and maintained ownership and control of said parcels of real estate.

3. Charles J. Stouter and Bernard H. Stouter claim sole ownership to said parcels of real estate by reason of the adverse holding and possession for a lengthy period of time, in excess of 25 years on the part of their father, Joseph Henry Stouter, now deceased, their mother, Martha A. Stouter, now deceased, and themselves.

ROSENSTOCK, McSHERRY, BURGE & PHILLIPS, P.A., FREDERICK, MARYLAND